

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

NORTHERN DYNASTY
MINERALS LTD. and PEBBLE
LIMITED PARTNERSHIP,

Plaintiffs,

v.

U.S. ENVIRONMENTAL PROTECTION
AGENCY,

Defendant.

Case No. 3:24-cv-00059-SLG

DECLARATION OF BJORN OLSON

I, Bjorn Olson, hereby declare:

1. My name is Bjorn Olson. I reside in Homer, Alaska. I am a filmmaker and a member of the board of KBCS.

2. I make this declaration in support of the Kachemak Bay Conservation Society's (KBCS) Motion to Intervene in the above-captioned litigation. I know these facts of my own personal knowledge and would competently testify to them if called as a witness in these proceedings.

3. KBCS's mission is to protect the environment of the Kachemak Bay region and greater Alaska by encouraging sustainable use and stewardship of natural resources through advocacy, education, information, and collaboration. KBCS focuses on habitat

and wildlife issues, wetlands protection, water quality, logging, oil and gas leasing, energy conservation, sustainability issues, and land use planning. The Society monitors environmental issues locally and statewide.

4. I am a member of KBCS because I support the Society's work to protect Alaskan lands, communities, and wildlife. As a resident of Homer and frequent visitor to the Bristol Bay area, I support KBCS's work to oppose Pebble Mine.

5. I have traveled extensively throughout the Bristol Bay region both for personal wilderness expeditions and for filmmaking and photography work contracts. My first trip to the Bristol Bay region was a human-powered expedition I undertook in 2013. We began by taking a landing craft out of Homer to William's Port. From William's Port, we fat-biked the entire northern shore of Lake Iliamna to Igiugig, passing through Iliamna and Newhalen Villages. From Igiugig we put our bikes on our packrafts and paddled down the Kvichak River down to Naknek. From Naknek we rode into King Salmon. On this trip, I made a point to visit Talarek Creek near the proposed Pebble Mine site.

6. In 2018, I was contracted by the United Tribes of Bristol Bay (UTBB) to film in-region testimonies that were given to the Army Corps of Engineers regarding Pebble Mine during the Scoping phase. I was again contracted by UTBB in 2019 to film testimonies being delivered to the Army Corps of Engineers on the Draft Environmental Impact Statement. I twice visited the Village of Kokhanok, twice to Igiugig Village,

twice to Nondalton, twice to Iliamna/Newhalen, twice to Dillingham, and once to New Stuyhok for these work-related trips.

7. In 2019, I visited Dillingham and Aleknagik to visit friends and to photograph their wedding.

8. I plan to return to Bristol Bay in July 2024 to visit Naknek, Dillingham, and several other villages for a documentary film project about Bristol Bay's double ended sailboat history. I also plan to kayak from Dillingham to Round Island to assist the on-site biologist with her work with the walrus on the island, and to attempt a fat-bike expedition from King Salmon to Cold Bay.

9. I am deeply opposed to industrial mining in Alaska, in general, but within Bristol Bay in particular. According to recent United Nations' data, our civilization of 8-billion people has placed our planet into 70% ecological overshoot, which is to say that 70% of the natural resources we currently consume cannot regenerate faster than our consumption rates.¹ To return to sustainability, we must greatly constrict our economy. We must work to preserve every remaining and functioning bioregion to help buffer us from the worst outcomes from the uncertain future ahead. Clean water and subsistence resources have allowed people to live in Alaska for many thousands of years. These are

¹ *Humanity Uses 70% More Of The Global Commons Than The Earth Can Regenerate*, GLOBAL ENV'T FACILITY (Nov. 14, 2017), <https://www.thegef.org/news/humanity-uses-70-more-global-commons-earth-can-regenerate>; Richardson et al., *Earth Beyond Six of Nine Planetary Boundaries*, 9 SCI. ADVANCES, Sept. 2023, at 4, <https://www.science.org/doi/10.1126/sciadv.adh2458>.

the traditional, customary resources that are worth more than all the copper in the world, the resources that all people need to survive and thrive.

10. There are a variety of ways I would be harmed if the Pebble Mine were to be permitted and built. My community of Homer is already feeling the strain of new development, both in terms of housing and services, but also impacts on our natural, renewable resources. If Pebble Mine were permitted, the influx of out-of-state workers would add even more strain on my community, not to mention that many of my friends and family are Bristol Bay fishermen.

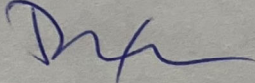
11. The plaintiffs in this litigation seek to reverse EPA's important decision protecting the Bristol Bay region, and this would have devastating impacts on KBCS and on my community of Homer, as well as on me and my ability to continue to explore and document the Bristol Bay area.

12. KBCS and its members are not adequately represented by EPA in this lawsuit. While we support EPA's Final Determination, we can only be sure that our interests are protected by participating in the lawsuit as a party. EPA has changed course before, as in 2017 when it abruptly withdrew its Proposed Determination after a change in administration. Agency leadership could change again during the pendency of this lawsuit, especially in light of the upcoming November 2024 election. EPA does not have the intimate knowledge and understanding of the Bristol Bay region in the same way that the people who are of the land and spend time on the land do. Only by intervening and

gaining the rights of a party can KBCS and its members be sure that its interests and those of its members and supporters are protected.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 30th day of April, 2024 in Homer, Alaska.

Bjorn Olson


Bjorn Olson